

# Statement of Basis of the Federal Operating Permit

Printpack, Inc.

Site Name: Printpack Grand Prairie Converting Facility  
Physical Location: 2005 S Great Southwest Pkwy  
Nearest City: Grand Prairie  
County: Tarrant

Permit Number: O1502  
Project Type: Renewal

The North American Industry Classification System (NAICS) Code: 322221  
NAICS Name: Coated and Laminated Packaging Paper and Plastics Film Manufacturing

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: August 1, 2018

## **Operating Permit Basis of Determination**

### **Permit Area Process Description**

The facility is a converter of flexible packaging material. This process includes flexographic printing of paper and film substrates, adhesive or extrusion lamination of individual substrates to form multi-layer package material, and the slitting of large printed rolls into narrower rolls for customer label or form and fill machinery.

The following are descriptions of the process steps and activities involved in manufacturing flexible packaging material:

#### Ink Room

Laminating adhesives, finished ink, drummed solvent, nitro-cellulose base, and vehicles are stored in the ink room. Ink may be ready to use or it may be mixed to specification in the ink room by combining specific vehicles and bases. Unused ink is returned to the ink room where it may be used for a future job.

#### Bulk Solvent Storage

Four above ground horizontal ten thousand gallon tanks store the bulk solvents. The tanks are divided into several compartments, which store various formulations of process solvent. Also, wash-up solvent recovered from the still is stored in bulk. Both the wash-up solvent and the process solvent are piped to the ink room and the press room. The process solvent is used to cut inks to the appropriate viscosity, and the wash-up solvent is used to clean ink spills. In addition, the wash-up solvent is piped to the automatic parts washer where it may be used to clean ink kits, anilox rollers, and ink pans. The spent solvent is distilled and sent back to bulk storage.

#### Press Department

Paper and film are printed using a flexographic printing process. The inks may arrive at the press room ready to use, or they may be cut to running viscosity at the press room. The unused ink is returned to the ink room. The spent ink and solvent from pump purging and clean-up are sent to the integrated still/parts washer for reclamation. The printed film is sent to in-process storage for further processing.

#### Parts Washer/Still

Dirty kits, anilox rollers, and ink trays are placed on a roll-in dolly, and the dolly is placed in the parts washer. The parts are then sprayed and rinsed. After the wash and rinse cycle, the off gas is vented to the oxidizer. The dirty wash-up solvent is then pumped to a dirty solvent holding tank where it is either recirculated to the parts washer or batch processed through the still. Spent ink and solvent can also be processed through the still. The clean solvent is pumped back to the bulk solvent storage.

In addition, the facility has a manual parts washer co-located with the automatic parts washer. The manual parts washer is used to clean parts that do not get clean in the automatic washer and to wash bulky items. The emissions are exhausted to the oxidizer, and the spent solvent is distilled for reuse.

#### Waste Storage

A six thousand gallon, above ground, cone bottom tank, located in a diked containment area, stores pumpable sludge and adhesive waste. Solidified adhesive waste is stored in closed 55 gallon drums in the ink room.

#### Laminating Department

The film from in-process storage is laminated to one or more backstock materials through extrusion lamination process. Extrusion laminating combines two sheets of film into a laminate by using hot extruded material as a bonding agent. An adhesion promoter may be used on one or more of the substrates, depending on the substrates.

Adhesive laminating is the most common method of lamination in the industry. The process involves bonding together the paper, film, and foils with liquid adhesives to achieve specific end-use properties. Dry bonding is used on Laminator 21. A liquid adhesive is applied to one of the substrates, and then the adhesive solvent is removed with a conventional drying tunnel by heat and high velocity air. With the removal of the solvent, the adhesive becomes tacky and the components are ready to be combined.

### Photopolymer Plate Making

The printing plates are made from three dimensional structures that contain a photosensitive polymer. The polymer is a special plastic that cures when exposed to ultraviolet light. An unprocessed plate consists of a transparent polyester back, a layer of photosensitive polymer, a transparent slip film that covers the polymer, and a protective sheet of translucent polyester. The unprocessed plate is covered with a photo negative made from art and work containing topography, halftones, line drawings, etc. The negative acts as a mask so that some areas are exposed to UV and others are not. The uncured areas are washed away, and the 3-D printing image is left.

### **FOPs at Site**

The “application area” consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

### **Major Source Pollutants**

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC
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### **Reading State of Texas’s Federal Operating Permit**

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as “applicable requirements”) that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
  - Additional Monitoring Requirements
  - New Source Review Authorization Requirements
  - Compliance Requirements
  - Protection of Stratosphere Ozone
  - Permit Location
  - Permit Shield (30 TAC § 122.148)
- Attachments
  - Applicable Requirements Summary
    - Unit Summary
    - Applicable Requirements Summary
  - Additional Monitoring Requirements
  - Permit Shield
  - New Source Review Authorization References
  - Compliance Plan
  - Alternative Requirements

- Appendix A
  - Acronym list

## General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

## Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

## Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

## Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

### **Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions**

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

## Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	No
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	No
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CSAPR (Cross-State Air Pollution Rule)	No

## Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

## Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.

7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

### **Determination of Applicable Requirements**

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at [www.tceq.texas.gov/permitting/air/nav/air\\_all\\_ua\\_forms.html](http://www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html).

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at [www.tceq.texas.gov/permitting/air/nav/air\\_supportsys.html](http://www.tceq.texas.gov/permitting/air/nav/air_supportsys.html). The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There

may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

#### Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.



### Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRPTKFARM	30 TAC Chapter 115, Storage of VOCs	R5116-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>	
GRPTKFARM	30 TAC Chapter 115, Storage of VOCs	R5116-2	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>	
GRPTKFARM	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Waste mixture of indeterminate or variable composition</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>	
GRPTKRTO	30 TAC Chapter 115, Storage of VOCs	R5112-1	<p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Other vapor destruction unit</p>	
GRPTKRTO	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>	
PW01	30 TAC Chapter 115, Degreasing Processes	R5412	<p>Solvent Degreasing Machine Type = Cold solvent cleaning machine.</p> <p>Alternate Control Requirement = The TCEQ Executive Director has approved an alternative control requirement as allowed under 30 TAC § 115.413.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
PW02	30 TAC Chapter 115, Degreasing Processes	R5412	<p>Solvent Degreasing Machine Type = Cold solvent cleaning machine.</p> <p>Alternate Control Requirement = The TCEQ Executive Director has approved an alternative control requirement as allowed under 30 TAC § 115.413.</p> <p>Solvent Sprayed = A solvent is sprayed.</p> <p>Solvent Vapor Pressure = Solvent vapor pressure is greater than 0.6 psia as measured at 100 degrees Fahrenheit.</p> <p>Solvent Heated = The solvent is not heated to a temperature greater than 120° F.</p> <p>Parts Larger than Drainage = No cleaned parts for which the machine is authorized to clean are larger than the internal drainage facility of the machine.</p> <p>Drainage Area = Area is greater than or equal to 16 square inches.</p> <p>Disposal in Enclosed Containers = Waste solvent is properly disposed of in enclosed containers.</p>	
PRO-EL33	30 TAC Chapter 115, Surface Coating Operations	R5423-1	<p>Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director or no such alternate has been requested.</p> <p>Facility Operations = Other miscellaneous metal parts and products coating.</p> <p>Maintenance Shop = Recoating used miscellaneous metal parts and products at an on-site maintenance shop that began operations before January 1, 2012.</p> <p>VOC Emission Rate = Uncontrolled emission rates not qualifying for exemption from control.</p> <p>Vapor Recovery = A permanent total enclosure is utilized that directs all VOCs to a control device.</p>	The rule citations were determined from an analysis of the rule text and the basis of determination.
PRO-EL35	30 TAC Chapter 115, Surface Coating Operations	R5423-1	<p>Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director or no such alternate has been requested.</p> <p>Facility Operations = Other miscellaneous metal parts and products coating.</p> <p>Maintenance Shop = Recoating used miscellaneous metal parts and products at an on-site maintenance shop that began operations before January 1, 2012.</p> <p>VOC Emission Rate = Uncontrolled emission rates not qualifying for exemption from control.</p> <p>Vapor Recovery = Vapor recovery systems other than total enclosures or those used for recovery of VOC or to control emissions from wood parts and products coating operations.</p>	The rule citations were determined from an analysis of the rule text and the basis of determination.
PRO-EL37/39	30 TAC Chapter 115, Surface Coating Operations	R5423-1	<p>Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director or no such alternate has been requested.</p> <p>Facility Operations = Other miscellaneous metal parts and products coating.</p> <p>Maintenance Shop = Recoating used miscellaneous metal parts and products at an on-site maintenance shop that began operations before January 1, 2012.</p> <p>VOC Emission Rate = Uncontrolled emission rates not qualifying for exemption from control.</p> <p>Vapor Recovery = Vapor recovery systems other than total enclosures or those used for recovery of VOC or to control emissions from wood parts and products coating operations.</p>	The rule citations were determined from an analysis of the rule text and the basis of determination.

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
PRO-L01	30 TAC Chapter 115, Surface Coating Operations	R5423-1	<p>Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director or no such alternate has been requested.</p> <p>Facility Operations = Other miscellaneous metal parts and products coating.</p> <p>Maintenance Shop = Recoating used miscellaneous metal parts and products at an on-site maintenance shop that began operations before January 1, 2012.</p> <p>VOC Emission Rate = Uncontrolled emission rates not qualifying for exemption from control.</p> <p>Vapor Recovery = Vapor recovery systems other than total enclosures or those used for recovery of VOC or to control emissions from wood parts and products coating operations.</p>	The rule citations were determined from an analysis of the rule text and the basis of determination.
PRO-SAL30	30 TAC Chapter 115, Surface Coating Operations	R5423-1	<p>Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director or no such alternate has been requested.</p> <p>Facility Operations = Other miscellaneous metal parts and products coating.</p> <p>Maintenance Shop = Recoating used miscellaneous metal parts and products at an on-site maintenance shop that began operations before January 1, 2012.</p> <p>VOC Emission Rate = Uncontrolled emission rates not qualifying for exemption from control.</p> <p>Vapor Recovery = Vapor recovery systems other than total enclosures or those used for recovery of VOC or to control emissions from wood parts and products coating operations.</p>	The rule citations were determined from an analysis of the rule text and the basis of determination.
PRO-PR08	30 TAC Chapter 115, Graphic Arts Processes	R5432-1	<p>Alternate Control Requirement = The TCEQ Executive Director has not approved an alternate method of demonstrating and documenting continuous compliance with the alternate control requirement (ACR) or exemption criteria or no request has been made.</p> <p>Process Type = The operation is a flexible package process located in D-FW or HGB after 03/01/2013.</p> <p>Potential Uncontrolled VOC Emissions = Potential uncontrolled VOC emissions are greater than or equal to 25 tpy.</p> <p>Control Method = A vapor control system that achieves an overall control efficiency of at least 80% by weight.</p> <p>Control Device = A capture system and an incinerator is used for VOC control.</p> <p>Permanent Total Enclosure = A permanent total enclosure, which meets the specifications of 40 CFR Part 52.741, Subpart O, Appendix B, Procedure T, and which directs all VOC to a control device, is used.</p>	
PRO-PR09	30 TAC Chapter 115, Graphic Arts Processes	R5432-1	<p>Alternate Control Requirement = The TCEQ Executive Director has not approved an alternate method of demonstrating and documenting continuous compliance with the alternate control requirement (ACR) or exemption criteria or no request has been made.</p> <p>Process Type = The operation is a flexible package process located in D-FW or HGB after 03/01/2013.</p> <p>Potential Uncontrolled VOC Emissions = Potential uncontrolled VOC emissions are greater than or equal to 25 tpy.</p> <p>Control Method = A vapor control system that achieves an overall control efficiency of at least 80% by weight.</p> <p>Control Device = A capture system and an incinerator is used for VOC control.</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			Permanent Total Enclosure = A permanent total enclosure, which meets the specifications of 40 CFR Part 52.741, Subpart O, Appendix B, Procedure T, and which directs all VOC to a control device, is used.	
PRO-PR10	30 TAC Chapter 115, Graphic Arts Processes	R5432-1	<p>Alternate Control Requirement = The TCEQ Executive Director has not approved an alternate method of demonstrating and documenting continuous compliance with the alternate control requirement (ACR) or exemption criteria or no request has been made.</p> <p>Process Type = The operation is a flexible package process located in D-FW or HGB after 03/01/2013.</p> <p>Potential Uncontrolled VOC Emissions = Potential uncontrolled VOC emissions are greater than or equal to 25 tpy.</p> <p>Control Method = A vapor control system that achieves an overall control efficiency of at least 80% by weight.</p> <p>Control Device = A capture system and an incinerator is used for VOC control.</p> <p>Permanent Total Enclosure = A permanent total enclosure, which meets the specifications of 40 CFR Part 52.741, Subpart O, Appendix B, Procedure T, and which directs all VOC to a control device, is used.</p>	
PRO-PR11	30 TAC Chapter 115, Graphic Arts Processes	R5432-1	<p>Alternate Control Requirement = The TCEQ Executive Director has not approved an alternate method of demonstrating and documenting continuous compliance with the alternate control requirement (ACR) or exemption criteria or no request has been made.</p> <p>Process Type = The operation is a flexible package process located in D-FW or HGB after 03/01/2013.</p> <p>Potential Uncontrolled VOC Emissions = Potential uncontrolled VOC emissions are greater than or equal to 25 tpy.</p> <p>Control Method = A vapor control system that achieves an overall control efficiency of at least 80% by weight.</p> <p>Control Device = A capture system and an incinerator is used for VOC control.</p> <p>Permanent Total Enclosure = A permanent total enclosure, which meets the specifications of 40 CFR Part 52.741, Subpart O, Appendix B, Procedure T, and which directs all VOC to a control device, is used.</p>	

\* - The "unit attributes" or operating conditions that determine what requirements apply

\*\* - Notes changes made to the automated results from the DSS, and a brief explanation why

## NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

## New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room,

located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. In addition, many of the permits are accessible online through the link provided below. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. Registrations submitted by permittees are also available online through the link provided below. The following table specifies the permits by rule that apply to the site.

The status of air permits, applications, and Permits by Rule (PBR) registrations may be found by performing the appropriate search of the databases located at the following website:

[www.tceq.texas.gov/permitting/air/nav/air\\_status\\_permits.html](http://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html)

Details on how to search the databases are available in the **Obtaining Permit Documents** section below.

#### **New Source Review Authorization References**

<b>Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.</b>	
Authorization No.: 9981	Issuance Date: 10/20/2017
<b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.418	Version No./Date: 09/04/2000

#### **Emission Units and Emission Points**

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

#### **Monitoring Sufficiency**

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting

requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

## **Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected**

### **Compliance Assurance Monitoring (CAM):**

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

<b>Unit/Group/Process Information</b>	
ID No.: PRO-EL33	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Surface Coating Operations	SOP Index No.: R5423-1
Pollutant: VOC	Main Standard: § 115.423(3)(A)
<b>Monitoring Information</b>	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

Unit/Group/Process Information	
ID No.: PRO-EL35	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Surface Coating Operations	SOP Index No.: R5423-1
Pollutant: VOC	Main Standard: 115.420
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	



Unit/Group/Process Information	
ID No.: PRO-EL37/39	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Surface Coating Operations	SOP Index No.: R5423-1
Pollutant: VOC	Main Standard: § 115.423(3)(A)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

Unit/Group/Process Information	
ID No.: PRO-L01	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Surface Coating Operations	SOP Index No.: R5423-1
Pollutant: VOC	Main Standard: 115.420
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

Unit/Group/Process Information	
ID No.: PRO-PR08	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Graphic Arts Processes	SOP Index No.: R5432-1
Pollutant: VOC	Main Standard: § 115.432(c)(1)(C)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

Unit/Group/Process Information	
ID No.: PRO-PR09	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Graphic Arts Processes	SOP Index No.: R5432-1
Pollutant: VOC	Main Standard: § 115.432(c)(1)(C)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

Unit/Group/Process Information	
ID No.: PRO-PR10	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Graphic Arts Processes	SOP Index No.: R5432-1
Pollutant: VOC	Main Standard: § 115.432(c)(1)(C)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

Unit/Group/Process Information	
ID No.: PRO-PR11	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Graphic Arts Processes	SOP Index No.: R5432-1
Pollutant: VOC	Main Standard: § 115.432(c)(1)(C)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

Unit/Group/Process Information	
ID No.: PRO-SAL30	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Surface Coating Operations	SOP Index No.: R5423-1
Pollutant: VOC	Main Standard: 115.423(3)(A)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

## Obtaining Permit Documents

The New Source Review Authorization References table in the FOP specifies all NSR authorizations that apply at the permit area covered by the FOP. Individual NSR permitting files are located in the TCEQ Central File Room (TCEQ Main Campus located at 12100 Park 35 Circle, Austin, Texas, 78753, Building E, Room 103). They can also be obtained electronically from TCEQ's Central File Room Online (<https://www.tceq.texas.gov/goto/cfr-online>). Guidance documents that describe how to search electronic records, including Permits by Rule (PBRs) or NSR permits incorporated by reference into an FOP, archived in the Central File Room server are available at [https://www.tceq.texas.gov/permitting/air/nav/air\\_status\\_permits.html](https://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html)

All current PBRs are contained in Chapter 106 and can be viewed at the following website:

[https://www.tceq.texas.gov/permitting/air/permitbyrule/air\\_pbr\\_index.html](https://www.tceq.texas.gov/permitting/air/permitbyrule/air_pbr_index.html)

Previous versions of 30 TAC Chapter 106 PBRs may be viewed at the following website:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/old106list/index106.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html)

Historical Standard Exemption lists may be viewed at the following website:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/oldselist/se\\_index.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html)

Additional information concerning PBRs is available on the TCEQ website:

[https://www.tceq.texas.gov/permitting/air/nav/air\\_pbr.html](https://www.tceq.texas.gov/permitting/air/nav/air_pbr.html)

## Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on March 28, 2018.

Site rating: 7.81 / Satisfactory Company rating: 4.41 / Satisfactory

(*High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55*)

2. Has the permit changed on the basis of the compliance history or site/company rating? .....No

## Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS? .....No

2. Is a compliance plan and schedule included in the permit? .....No

## Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes

OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes

OP-UA3 - Storage Tank/Vessel Attributes

OP-UA4 - Loading/Unloading Operations Attributes

OP-UA5 - Process Heater/Furnace Attributes

OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes

OP-UA7 - Flare Attributes

OP-UA8 - Coal Preparation Plant Attributes

OP-UA9 - Nonmetallic Mineral Process Plant Attributes

OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes

OP-UA11 - Stationary Turbine Attributes

OP-UA12 - Fugitive Emission Unit Attributes

OP-UA13 - Industrial Process Cooling Tower Attributes

OP-UA14 - Water Separator Attributes

OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes

OP-UA16 - Solvent Degreasing Machine Attributes

OP-UA17 - Distillation Unit Attributes

OP-UA18 - Surface Coating Operations Attributes

OP-UA19 - Wastewater Unit Attributes



OP-UA20 - Asphalt Operations Attributes  
OP-UA21 - Grain Elevator Attributes  
OP-UA22 - Printing Attributes  
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes  
OP-UA25 - Synthetic Fiber Production Attributes  
OP-UA26 - Electroplating and Anodizing Unit Attributes  
OP-UA27 - Nitric Acid Manufacturing Attributes  
OP-UA28 - Polymer Manufacturing Attributes  
OP-UA29 - Glass Manufacturing Unit Attributes  
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes  
OP-UA31 - Lead Smelting Attributes  
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes  
OP-UA33 - Metallic Mineral Processing Plant Attributes  
OP-UA34 - Pharmaceutical Manufacturing  
OP-UA35 - Incinerator Attributes  
OP-UA36 - Steel Plant Unit Attributes  
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes  
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes  
OP-UA39 - Sterilization Source Attributes  
OP-UA40 - Ferroalloy Production Facility Attributes  
OP-UA41 - Dry Cleaning Facility Attributes  
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes  
OP-UA43 - Sulfuric Acid Production Attributes  
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes  
OP-UA45 - Surface Impoundment Attributes  
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes  
OP-UA47 - Ship Building and Ship Repair Unit Attributes  
OP-UA48 - Air Oxidation Unit Process Attributes  
OP-UA49 - Vacuum-Producing System Attributes  
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes  
OP-UA51 - Dryer/Kiln/Oven Attributes  
OP-UA52 - Closed Vent Systems and Control Devices  
OP-UA53 - Beryllium Processing Attributes  
OP-UA54 - Mercury Chlor-Alkali Cell Attributes  
OP-UA55 - Transfer System Attributes  
OP-UA56 - Vinyl Chloride Process Attributes  
OP-UA57 - Cleaning/Depainting Operation Attributes  
OP-UA58 - Treatment Process Attributes  
OP-UA59 - Coke By-Product Recovery Plant Attributes  
OP-UA60 - Chemical Manufacturing Process Unit Attributes  
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes  
OP-UA62 - Glycol Dehydration Unit Attributes  
OP-UA63 - Vegetable Oil Production Attributes